

## Radinn AB Privacy Policy – concerning customers (Website)

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<b>1. Introduction</b>	

*Why do we have a privacy policy?*

Radinn AB, Reg. No. 556922-1459 (“**Radinn**” or “**we**”) cares about your privacy. Therefore, we always strive to protect your personal data in the best possible way and to comply with all applicable laws and regulations for the protection of personal data. In this policy, we want to inform you about how we collect and process your personal data in accordance with the EU regulation 2016/679 (the “**GDPR**”) to guarantee an open and transparent processing of your personal data. You can e.g., read about what personal data we may process, what rights you have in relation to your personal data vis-à-vis us and who we may share your personal data with.

It is important to us that you feel safe with what types of personal data we collect and, even more importantly, how we process them. Thus, this policy covers the necessary information about this, which is why we think it is important that you read and understand the information.

Please note that this policy covers all the processing that we carry out in connection with you e.g. purchasing our products (the “**Radinn Products**”), visiting our website, signing up for our newsletter or otherwise contact us. We also have a special privacy policy which

covers the processing that we may carry out in connection with you using our Radinn mobile app (the “**Application**”). Please note that you must download the Application to configure your Radinn Product before it is ready to use. For more information about the processing of personal data that we may carry out, when you use our Application, please see our privacy policy for our Application here: [insert html-address to the privacy policy on the Application].

*Who is responsible for your personal data?*

Radinn AB, Reg. No. 556922-1459, is the data controller regarding, and responsible for, the processing of your personal data. The following is Radinn’s contact information:

Address: Grimsbygatan 24, SE-211 20 Malmö, Sweden

Email: [privacy@radinn.com](mailto:privacy@radinn.com)

## **2. What personal data do we process?**

What kind of processing that we carry out, depends on the context in which you come into contact with us, and in which capacity you act. Below, we have listed what kinds of processing that we may carry out, divided into different category sections based on which services you use with us, for example purchases, signing up to newsletter, visiting our website, where under each category you can read about what kind of processing are carried out.

### **Purchase of Radinn Product**

<b>What personal data we process and where they come from:</b>	<b>For what purposes we process your personal data, i.e. what we do and why</b>	<b>What is the legal basis for our processing?</b>	<b>For how long do we process your personal data for the specific purpose?</b>
From you: <ul style="list-style-type: none"> <li>• your name;</li> <li>• your e-mail;</li> <li>• your phone number;</li> <li>• your delivery details; and</li> <li>• your payment details.</li> </ul>	We collect your personal data and use them to manage purchases, deliveries and complaints of, as well as payment for, our products.	To be able to perform under the contract with you.	This processing takes place for as long as it is required for our performance under the contract. Invoice documentation is stored in accordance with applicable legislation.

### **Customer service or other communication**

What personal data we process and where they come from:	For what purposes we process your personal data, i.e. what we do and why	What is the legal basis for our processing?	For how long do we process your personal data for the specific purpose?
<p>From you:</p> <ul style="list-style-type: none"> <li>• your name;</li> <li>• your e-mail;</li> <li>• your phone number;</li> <li>• your address;</li> <li>• If relevant, certain information about your Radinn Product; and</li> <li>• Your employer (If you are contacting us in your role as an employee).</li> </ul>	<p>We collect your personal data, either by you sending us an e-mail, by a telephone conversation with you or by you contacting us via our contact form on the website. The data you provide will be used for the purpose of answering your questions.</p>	<p>Our legitimate interest in being able to provide you with customer service.</p>	<p>This processing takes place for as long as the matter for which you requested customer service is operative.</p>

### Signing up for newsletter/other marketing

What personal data we process and where they come from:	For what purposes we process your personal data, i.e. what we do and why	What is the legal basis for our processing?	For how long do we process your personal data for the specific purpose?

<p>From you:</p> <ul style="list-style-type: none"> <li>• your name;</li> <li>• your e-mail;</li> <li>• your phone number; and</li> <li>• your address.</li> </ul>	<p>We collect your personal data and use them to contact you by e-mail or phone. If we use a service provider to distribute this, your personal data may be shared with them for this purpose. For more information on our sharing, see section</p>	<p>Your consent. You can withdraw this at any time. More information about your right to withdraw your consent can be found in section 8.</p>	<p>This processing takes place for as long as we have your consent (i.e. until you withdraw your consent). More information about the right to withdraw your consent can be found in section 8.</p>
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### Website users

<b>What personal data we process and where they come from:</b>	<b>For what purposes we process your personal data, i.e. what we do and why</b>	<b>What is the legal basis for our processing?</b>	<b>For how long do we process your personal data for the specific purpose?</b>
<p>From other sources:</p> <ul style="list-style-type: none"> <li>• Technical information generated through your use of the website;</li> <li>• information about your internet device, such as IP address, language settings, browser settings, operating system; and</li> <li>• time and date of the visit of</li> </ul>	<p>We collect your personal data when you visit our website in order to optimise your experience of the website and to be able to handle purchases, orders and other requests via the website. For more information, please see below under section 6.</p>	<p>Our legitimate interest in being able to provide our website.</p>	<p>This processing takes place during your visit of the website and is stored for up to 13 months and 4 days thereafter. For more information, please see below under section 6.</p>

### **3. Our assessment when processing your personal data based on the legal basis of our legitimate interest**

For certain purposes, we process your personal data and rely on our legitimate interest as the legal basis for the processing. In assessing the legal basis, we rely on a balancing of interests test by which we have determined that our legitimate interests of the processing override your interest and your fundamental right not to have your personal data processed. We have stated our legitimate interest in the tables above. Please contact us if you want to read more about how this test has been performed.

### **4. Categories of recipients with whom we may share your personal data**

#### ***Group companies***

*Recipients:* Companies within the Radinn Group.

*Purpose and legal basis:* This may be required for us to provide our services to you. We have a legitimate interest of being able to provide these services. If the sharing of your personal data is necessary to fulfil that interest, and that interest overrides your right not to have your data processed, the sharing may be carried out on the legal basis of legitimate interest.

#### ***Suppliers and subcontractors***

*Recipients:* We have agreements with other companies that perform certain services on our behalf. These services include, e.g. Identity Access Management and handling of purchases. These companies gain access to your personal data to the extent necessary for them to fulfill their assignment, but they may not use or share the data for other purposes.

*Purpose and legal basis:* We sometimes need to access the services of other companies. In such cases, we have a legitimate interest of being able to access these. If the sharing of your personal data is necessary to fulfill that interest, and that interest overrides your right not to have your data processed, sharing may take place on the legal basis of legitimate interest. However, these companies may not process or use your personal for any other purposes than to perform the services pursuant to the agreement.

#### ***Authorities***

*Recipients:* The Swedish Police Authority, the Swedish Enforcement Authority or other authorities or courts of law.

*Purpose and legal basis:* By law, we are sometimes obliged to share personal data with certain authorities, for example under the Act on Measures against Money Laundering and Terrorism Financing (*Sw. lagen om åtgärder mot penningtvätt och finansiering av terrorism*). Sharing may also occur in some cases, when you have requested us to do so. Thus, sharing to authorities can be carried out on the legal basis of compliance with legal

obligations or consent.

### ***Third party in corporate transaction***

*Recipients:* If we, or a significant part of our business, were to be sold to or integrated with a third party, your personal data may be passed on to the new owner of the business. Thereafter, the new owner of the business will be the data controller of your personal data.

*Purpose and legal basis:* Our potential legitimate interest to sell our operation, our part thereof, to a third party. To be able to do that, we must be able to share your personal data with such third party.

## **5. Transfer of personal data to third countries**

The sharing of data described above may be made to recipients in Member States of the EU/EEA as well as in third countries whose legislation may differ from the rules for data protection within the EU/EEA. In the case of transfers to such third countries, we will take appropriate measures to ensure that your personal data are adequately protected.

We will ensure that appropriate safeguards are put in place by ensuring that at least one of the following conditions is met in each such transfer.

<b>Safeguard and description thereof</b>	<b>Which countries we transfer personal data to on the basis of the specified safeguard</b>
<b>Standard Contractual Clauses according to art. 46.2 GDPR</b> Since only a few countries are considered to have an adequate level of protection, the most common measure to ensure sufficient protection in the event of a transfer outside the EU/EEA is to annex the EU Commission's Standard Contractual Clauses pursuant to Implementing Decisions 2001/497/EC, 2010/87/EU or 2021/914/EU, without any changes or amendments in conflict with the clauses.  If you want to read them in their entirety, you can download them via the European Commission's <a href="#">website</a> (under the heading <i>Standard contractual clauses for international transfers (Word)</i> ).	USA

## **6. Cookies and other tracking technologies**

In order for us to deliver our services with the highest possible quality, we use so-called

cookies and similar tracking technologies on our website.

When you visit our website, you will be asked if you consent to our use of cookies (with the exception of such necessary cookies that do not require your consent). You can delete cookies from your browser or adjust your settings for the use of cookies, at any time. You can read more about this in our cookie policy, which you can find here: [Insert html-link to cookie policy.]. In the cookie policy, we describe e.g. what types of cookies we use, what they are used for and for how long they are stored.

## **7. Security**

Radinn is committed to keeping your personal data secure against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Only authorized employees, agents and contractors (who have agreed to keep information secure and confidential) have access to your personal data.

## **8. Your rights**

According to applicable legislation, you have the right to exercise certain rights against us, when we process your personal data. Below we describe each right, and what it means for you in relation to the personal data we process. If you want to read more about what the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*) writes about these rights, there are links under each section to the relevant page on the Swedish Authority for Privacy Protection's [website](#).

If you want to exercise any of these rights, want to know more, or have questions, please feel free to contact us at [privacy@radinn.com](mailto:privacy@radinn.com) or by using the contact details set out in section 10 below.

### ***Right to information***

You have the right to be informed about how we process your personal data. In this privacy policy, we generally describe what personal data are processed by us in different contexts. If you want to know more about whether we process your personal data, and to what extent it is done, you can contact us as described above and request information about what personal data we process.

If you want to read more about the right to information – please see [here](#).

### ***Right to access to your personal data***

We can also provide you with a copy, a so-called register extract, of the personal data processed by us. In the register extract, we provide information about e.g. which categories of personal data are processed, what the personal data are used for, for how long the data will be stored, with whom the personal data has been shared and where the data come from.

If you want to read more about the right to access – please see [here](#).

### ***Right to rectification***

We strive to always have accurate personal data about you and to update them when necessary. If you discover that we process inaccurate data about you, you have the right to contact us as described above to have these corrected. You also have the right to ask us to complete incomplete data if this is relevant based on the purposes for which your data are processed, by providing us with additional information.

If you want to read more about the right to rectification – please see [here](#).

### ***Right to erasure***

You have the right to request the erasure of your personal data. However, this right is not absolute. Certain conditions must be at hand in order for us to erase your data. For example, you may have the right to have data erased if they are no longer necessary for the purposes for which they were collected, if you withdraw your consent or if you object to us using your data for direct marketing.

The right to erasure is also limited in the event that an exception applies to the data in question. For example, we have the right to retain the data if it is necessary for establishing, exercising or defending legal claims.

If you want to read more about the right to erasure – please see [here](#).

### ***Right to restriction***

You can request that the processing of your personal data should be restricted, for example if you do not think that the information we have about you is correct or if you believe that the processing is unlawful. Such request can also be made during the time we investigate whether our legitimate interests override your interest of privacy when you object to the processing (see more about this below).

If you want to read more about the right to restriction – please see [here](#).

### ***Right to object***

You always have the right to object to our processing if the legal basis for the processing (this is stated in the various processing operations above in section 2) is that it is necessary for purposes relating to our legitimate interest.

If you object, we do not have the right to process the data anymore, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or if it is needed for the establishment, exercise or defense of legal claims. If we consider that we have such legitimate grounds, or if the data are needed for the establishment, exercise or defense of legal claims, we will notify you of this, and the reasons for such assessment.

You can also object to your personal data being processed for marketing purposes



(including profiling if this is included as part of this). If you do so, we will cease the processing for these purposes.

If you want to read more about the right to object – please see [here](#).

### ***Right to data portability***

You have the right to receive your personal data, that you have provided to us (in case the legal basis for our processing is consent or performance of a contract), in a structured, commonly used and machine-readable format. However, this presupposes that the processing takes place by automated means (i.e. not in physical form on paper). If technically possible, and you wish to do so, we may also transmit such personal data to another data controller.

If you want to read more about the right to transmit personal data (data portability) – please see [here](#).

### ***Right to withdraw your consent***

You can withdraw the whole or part of the consent you have given at any time, with effect as from the withdrawal (i.e. the processing of personal data that we have carried out before the withdrawal will not be affected). This can be done by contacting us via the contact details in section 10. In the case of direct marketing via e-mail, a withdrawal can be carried out through a link attached in each such e-mail.

### ***Right to lodge a complaint with the competent supervisory authority***

You can lodge a complaint to the Swedish Authority for Privacy Protection (or with another supervisory authority) if you believe that our processing of your personal data is not in accordance with applicable legislation.

If you want to read more about the right to lodge a complaint – please see [here](#).

### ***Requirements for exercising your rights***

To protect your privacy, we may (if necessary) require you to prove your identity when you contact us to exercise your rights.

We handle your request to exercise your rights promptly. Your request will normally be answered within one month from the date the request was received by us. Only in the case of an unusually complicated request, or if we have received a large number of requests, the response time may be extended by up to two months. If an extension of the response time is decided upon, you will be notified of that.

## **9. Changes in this policy**

Radinn is entitled to amend this policy at any time if it is necessary to fulfill the requirements according to applicable laws and regulations or if it is necessary due to changes in Radinn's operations.

In such a situation, Radinn will provide information concerning the changes according to applicable law. Applicable information will be available in this privacy policy, on the Radinn website and/or provided in other appropriate ways.

## **10. Our contact details**

If you would like to contact us concerning our processing of your personal data or if you have questions concerning this privacy policy, you are welcome to contact us at [privacy@radinn.com](mailto:privacy@radinn.com).

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